

# **EXHIBIT 5**

Cadena, Maria  
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
Case No.: 5:22-cv-00949-KK-(SHKx)

L.C., a minor by and through her  
guardian ad litem Maria Cadena,  
individually and as  
successor-in-interest to Hector  
Puga; I.H., a minor by and through  
his guardian ad litem Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector  
Puga; A.L., a minor by and through  
her guardian ad litem Lydia Lopez,  
individually and as  
successor-in-interest to Hector  
Puga; and ANTONIA SALAS UBALDO,  
individually,

Plaintiffs,

v.

STATE OF CALIFORNIA; COUNTY OF  
SAN BERNARDINO; S.S.C., a nominal  
defendant; ISAIAH KEE; MICHAEL  
BLACKWOOD; BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS; and  
DOES 6-10, inclusive,

Defendants.

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF MARIA CADENA

Wednesday, December 11, 2024, 1:04 p.m.

Taken remotely via Zoom

REPORTED BY: Mary P. Randle, CSR No. 10312

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1 APPEARANCES:

2 (Appearances via videoconference)

3

4 For Plaintiffs:

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16 For Defendants State of California by and through  
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21

22 Also Present:

23  
24 Vionela Vaughn-Austin, Videographer

25

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1 TAKEN REMOTELY VIA ZOOM

2 WEDNESDAY, DECEMBER 11, 2024

3 1:04 P.M.

4

5 THE VIDEOGRAPHER: Good afternoon. This is the  
6 video deposition of Maria Cadena, taken remotely on  
7 December 11, 2024, in the matter of L.C. versus State of  
8 California, Case Number 5:22-cv-004 -- pardon me --  
9 52 -- 5:22-cv-00949-KK-(SHKx). This case is being heard  
10 in the United States District Court of Central District  
11 of California. The deposition is on the behalf of the  
12 Defendant.

13 My name is Vionela Vaughn-Austin, and I'm the  
14 legal videographer contracted through Dean Jones Legal  
15 Videos, Inc., of Los Angeles and Santa Ana, California.  
16 Now, because we're not in person, I, as the  
17 videographer, may have to interrupt the proceedings if  
18 the deponent drifts out of the frame or should any  
19 connectivity issues occur with the Zoom.

20 This deposition is commencing at 1:04 p.m.  
21 Would all present please identify yourselves, starting  
22 with the court reporter, then the deponent, and then  
23 counsel.

24 THE COURT REPORTER: Mary Randle on behalf of  
25 Jilio-Ryan Court Reporters.

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1 MS. GUSTAFSON: Can you state your name?

2 THE WITNESS: Oh, me?

3 THE VIDEOGRAPHER: Maria, would you please  
4 state your name.

5 THE WITNESS: Sure. Maria Cadena.

6 MS. GUSTAFSON: Shannon Gustafson on behalf of  
7 the County Defendants.

8 MS. ESQUIVEL: Diana Esquivel on behalf of the  
9 State Defendants.

10 MS. LE: Hang Le on behalf of the Deponent and  
11 the Plaintiffs in L.C. versus State of California.

12 THE VIDEOGRAPHER: Thank you. Now, would the  
13 court reporter please administer the oath.

14

15 MARIA CADENA,

16 having been first duly sworn, was examined and  
17 testified as follows:

18

19 EXAMINATION

20 BY MS. GUSTAFSON:

21 Q **Can you please state your name for the record.**

22 A Maria Cadena.

23 Q **Have you ever used any name other than**  
24 **Maria Cadena?**

25 A No.

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1 A Yes.

2 Q And how did she contact you three days ago?

3 A Through messenger on Facebook.

4 Q Did she say anything about why she was making  
5 contact with you?

6 A No. I was just -- I just told her I was  
7 surprised she got in contact with me. She was wondering  
8 how my daughter was doing.

9 Q Has Layla and Serenity spent any time together  
10 other than at the funeral?

11 A No.

12 Q Do you know Linda's last name?

13 A I don't.

14 Q Do you know where she lives?

15 A The last time I know, she lived in Los Angeles.

16 Q When you were with Hector, were you aware of  
17 any time that he had been arrested?

18 A No.

19 Q Were you aware -- or are you aware that he's  
20 ever been arrested of domestic violence?

21 A No.

22 Q Did he ever become violent with you?

23 A Just verbally.

24 Q Meaning you would have arguments where he would  
25 yell?

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1 A Yeah.

2 Q Did those happen frequently?

3 A Yes.

4 Q And would he typically be drinking during those  
5 arguments or they would just happen at other times as  
6 well?

7 A It was both, when he wasn't drinking and when  
8 he was drinking.

9 Q Was there anything in particular that the two  
10 of you would fight about?

11 A No. He was just a very jealous person.

12 Q Did you ever have any issues with him being  
13 around other women when he was with you?

14 A No.

15 Q As you sit here today, do you know if Hector's  
16 ever been arrested?

17 A No.

18 Q Do you know if he ever spent any time in prison  
19 or jail?

20 A No.

21 Q Did you ever hear about an incident where he  
22 was in a pursuit with L.A. Sheriff's Department and he  
23 fired a gun at them?

24 A Yes.

25 Q How did you find out about that incident?

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1 STATE OF CALIFORNIA )  
2 COUNTY OF SAN DIEGO )

3

4 I, Mary P. Randle, Certified Shorthand  
5 Reporter in and for the State of California,  
6 Certificate No. 10312, do hereby certify:

7 That prior to being examined, the witness named  
8 in the foregoing deposition was by me first duly sworn  
9 to testify to the truth, the whole truth, and nothing  
10 but the truth;

11 That said deposition was taken remotely before  
12 me at the time and place therein set forth and was taken  
13 down by me in shorthand and thereafter transcribed into  
14 typewriting under my direction and supervision;

15 I further certify that I am neither counsel for,  
16 nor related to, any party to said action, nor in any way  
17 interested in the outcome thereof.

18 In witness whereof, I have hereunto subscribed my  
19 name.

20 Dated: December 22, 2024

21

22

23

MARY P. RANDLE  
CSR No. 10312

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